

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DISTRICT**

CAROLYN HAWTHORNE,  
*on behalf of herself and those  
similarly situated;*

Plaintiff,

v.

NORTHVIEW VILLAGE, INC.  
d/b/a NORTHVIEW VILLAGE,  
HEALTHCARE ACCOUNTING  
SERVICES, LLC, and NORTHVIEW  
VILLAGE CENTER LIMITED  
PARTNERSHIP;

Defendants.

Case No.: 4:23-cv-01711-SRW

**DEFENDANTS NORTHVIEW VILLAGE, INC. D/B/A NORTHVIEW VILLAGE’S  
CONSENT MOTION FOR EXTENSION OF TIME  
TO FILE RESPONSIVE PLEADING**

COME NOW Defendants Northview Village Inc. d/b/a Northview Village (hereinafter, “NVI”) and Northview Village Center Limited Partnership (hereinafter, “NVC, LP”) (hereinafter collectively, “Defendants”), by and through the undersigned counsel of record and in accordance with Fed. R. Civ. P. 6(b)(1)(a) hereby submit their Consent Motion for Extension of Time to File a Responsive Pleading to Plaintiff’s Complaint. In support, Defendants state as follows:

1. Plaintiff Carolyn Hawthorne (“Plaintiff”) filed her Complaint against Defendants on December 22, 2023.

2. Service was obtained upon Defendants on December 28, 2023, thereby rendering Defendants’ responsive pleadings due on January 18, 2024.

3. Defendants seek an order from this Court extending their time to answer, move or otherwise respond up to and including, Friday, February 9, 2024.

4. This is the first request for additional time sought by Defendants in this action.
5. Plaintiff's counsel consents to Defendants' requested extension.
6. The enlargement of time is sought in good faith and not for purposes of delay.

Parties will not be prejudiced by said extension.

WHEREFORE, Defendants Northview Village Inc. d/b/a Northview Village and Northview Village Center Limited Partnership respectfully request this Court enter an order granting Defendants up to and including Friday, February 9, 2024 to move or otherwise respond to Plaintiff's Complaint and for such other and further relief as this Court deems just and appropriate under the premises

Respectfully Submitted,

**GORDON REES SCULLY MANSUKHANI, LLP**

By: /s/ James C. Morris

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Inc. d/b/a Northview Village and Northview  
Village Center L.P.*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing instrument was electronically filed with the Clerk of the Court on January 18, 2024, thereby executing service upon all counsel of record by operation of the Court's electronic filing system.

/s/ James C. Morris